

REMARKS

This response contains no amended claims. It is submitted that the IDS previously submitted in an amendment dated 5 March 2004 and re-submitted herein should be considered since full legible copies compliant with 37 CFR 1.98(a)(2) were submitted. Further, no amendments are made herein that introduce new issues.

I. Information Disclosure Statement

The Rejection states that an IDS including 3 references and associated foreign search report supplied with an amendment filed concerning this application on 5 March 2004 failed to comply with 37 CFR 1.98(a)(2) in that it did not provide either copies or legible copies of the references cited in this IDS.

The Applicants submit that full legible copies of the search report and cited references were supplied in the previous amendment as corroborated by a filing receipt (copy attached) stamped by the USPTO on 8 March 2004 stating that the IDS was received with 3 cited references and accompanying search report. The IDS and copies of references and search report are re-submitted herein. Consequently, the Applicants submit that the IDS did comply with 37 CFR 1.98 and request reconsideration of the application in view of these cited references.

II. Rejection under 35 U.S.C. 102(a)

Claims 1-2, 4-5, 7-11, 13 and 15-21 are rejected under 35 U.S.C. 102(a) as being anticipated by U.S. Patent 6,237,144 – Delo. These claims are deemed to be patentable for the reasons given below.

Claim 1 recites a method for “automated generation of installation instructions for an executable software application, comprising: retrieving template installation instruction information from a persistent data store; deriving installation related information supporting data exchange between different systems from configuration data associated with the application; incorporating the derived installation related information into the template installation information to form installation instruction data; and storing the derived installation instruction data”. These features are not shown (or suggested) in Delo.

The “automated” generation of installation instructions for an executable software application of claim 1 involves “deriving installation related information supporting data exchange between different systems from configuration data associated with the application” and “incorporating the derived installation related information” into “template installation information to form installation instruction data”. These features enable the provision of “up-to-date documentation” that “substantially eliminates the possibility that documentation” does “not match the interface”, lessens the “possibility that installation documentation will get misplaced or destroyed” and allows “an installer of interfaces to automatically create real-time documentation reflecting all changes, substantially eliminating the cost of installation documentation distribution” (Application page 7 line 9 to page 8 line 2).

In contrast the system of Delo addresses particular identified deficiencies involved in installing computer programs “by providing a method and system for installing computer programs where installation is accomplished based on an “as complete” description of the installed features, components and resources of the computer program” (Delo column 2 lines 28-63). The Delo system does not show or suggest “deriving installation related information supporting data exchange between different systems from configuration data associated with the application” and “incorporating the derived installation related information” into “template installation information to form installation instruction data”.

Delo Figure 4 or elsewhere fails to show or suggest incorporation of “derived installation related information” into “template installation information” at all and does not even discuss or mention “template installation instruction information”. Contrary to the Rejection statement (on page 3), Delo in Figure 4 Table 405 and associated text merely presents a block diagram “illustrating exemplary data table structures for maintaining data relating to computer software features, components, and resources” (Delo column 4 lines 24-29). It does NOT show or suggest “installation instruction information”. Rather, Figure 6 of Delo contains “installation instructions” specifically “FIG. 6 is a flow diagram illustrating exemplary steps for installing and un- installing particular computer software components” (Delo column 4 lines 33-37). There is NO disclosure or suggestion in Delo of “**deriving** installation related information supporting data exchange” **from** the “**configuration data associated**” with the “**application**” for which “installation instructions” are being generated” and “incorporating the derived installation related

information into the template installation information to form installation instruction data”.

The system of claim 1 concerns generation of installation instructions. In contrast Delo is silent (and provides no 35 USC 112 enabling disclosure) on HOW installation instructions are generated. Delo merely states that “information *required to effect* the installation” is illustrated in the data tables shown in FIG. 4. (Delo column 12 line 66 to column 13 line 7). Simply indicating that particular information is “required to effect” installation does not provide enabling disclosure of HOW installation instructions are generated and does not suggest “**incorporating the derived installation** related information into the template installation information to form installation instruction data”.

Contrary to the Rejection statement (on page 3 and elsewhere), Delo in Figure 4 Table 405 and associated text merely presents a block diagram “illustrating exemplary data table structures for maintaining data relating to computer software features, components, and resources” and “feature/component table **415**...is used to map features defined by data contained in the feature table **405** to components of those features which are defined by data contained in the component table **425**”. Such features include “lex engine component **427**, the dictionary component **428**, and the spell engine component **429**” that “comprise the spell feature **407**”. The “feature/component table **415** is utilized to join or link the features represented in the feature table **405** with their constituent components represented in the component table **425**” (Delo column 10 lines 22-35). Delo figure 4 or elsewhere does not show or suggest “automated” generation of installation instructions by “retrieving template installation instruction information”, “deriving installation related information” and “incorporating the derived installation related information into the template installation information to form installation instruction data”.

Similarly, contrary to the Rejection statement (on page 3 and elsewhere), Delo in Figure 4 Table 415 and associated text does not show or suggest “deriving installation related information” supporting “**data exchange** between **different systems** from configuration data associated with the application” and does not show or suggest “**automated**” generation of such “installation related information” for “an executable software application”. Delo Figure 4 or elsewhere fails to show or suggest “deriving installation related information” from “configuration data” at all. In addition since Delo addresses particular identified

deficiencies involved in installing computer programs (Delo column 2 lines 28-63) and NOT the specific problems involved in providing “up-to-date documentation” for use in application and interface installation, there is no problem recognition, other motivation or reason for Delo to incorporate the claimed features. Consequently, withdrawal of the rejection of claim 1 under 35 USC 102(a) is respectfully requested.

Dependent claim 2 is considered to be patentable based on its dependence on claim 1. Claim 2 is also considered to be patentable because, contrary to the Rejection statement on page 3-4, Delo does NOT show or suggest extracting “an identity of data files comprising the application” and “prompting questions to be answered by a user upon installation of the application” that “support data exchange between different systems **from the configuration data associated**” with the “**application**” for which “installation instructions” are being generated. Delo states “At step **665**, an install script **500**, as illustrated in FIG. 5, is generated with records containing data representing instructions for the execution of the desired installation action” (Delo column 16 lines 27-33). Install script 500 is a program executed in step 670 of the process of Figure 6 (Delo column 16 lines 34-36, column 13 line 2-36) and does NOT involve generation of “prompt questions” to a user. The prompt questions relied in the Rejection on page 3 in Delo (column 14 lines 50-53, and column 14 line 54 to column 15 line 2) occur in the user interactive (i.e., involving manual operation) of the Delo process of Figure 6 (“At step **615**,...the installer application **201** may display a user interface, such as a dialog box, which presents the user with the option of selecting which features of the product to install” Delo column 14 lines 45-53).

There is no 35 USC 112 enabling disclosure at all in Delo of how the installation process of Figure 6 that includes step 615, is generated. Consequently, there is no suggestion in Delo of extracting “prompting questions to be answered by a user upon installation of the application” that “support data exchange between different systems **from the configuration data associated**” with the “**application**” for which “installation instructions” are being generated.

Dependent claim 4 is considered to be patentable based on its dependence on claim 1. Claim 4 is also considered to be patentable because Delo does not show (or suggest) the combination of features of claim 4 involving “formatting” the derived installation instruction data” supporting “**data exchange between different systems**” as “installation documentation for reproduction on an output

device, the output device comprising a printer and a video display”. Delo does not show or suggest such a feature combination.

Dependent claim 5 is considered to be patentable based on its dependence on claim 1. Claim 5 is also considered to be patentable because Delo does not show (or suggest) a system in which the “derived installation instruction data comprises installation instruction text data for output as installation documentation”. Contrary to the Rejection statement on page 4, Delo Figure 4 does NOT show “installation instructions” but merely “information *required to effect* the installation” in the data tables shown in FIG. 4. (Delo column 12 line 66 to column 13 line 7). Further, there is no 35 USC 112 enabling disclosure at all in Delo of how the installation instructions of the process of Delo Figure 6 are generated. Consequently, there is no suggestion in Delo of automated generation of installation instructions by deriving “installation **instruction text data** for output as installation **documentation**” that supports “data exchange between different systems from the configuration data associated” with the “application” for which “installation instructions” are being generated.

Dependent claim 7 is considered to be patentable based on its dependence on claim 1. Claim 7 is also considered to be patentable because Delo does not show (or suggest) a method including “selecting a file containing the template installation instruction information from a plurality of files containing a corresponding plurality of installation instruction documentation templates for interface applications supporting data exchange between different systems”. As previously explained Delo does not show or suggest use of “template installation instruction information” at all.

Dependent claim 8 is considered to be patentable based on its dependence on claim 1. Claim 8 is also considered to be patentable because Delo does not show or suggest a method for “deriving installation related information supporting data exchange between different systems from configuration data associated with the application” including the step of “creating a prompt question generating routine for inclusion in the installation instruction data by incorporating prompt questions into a predetermined question prompting executable procedure, the prompt questions being for answer by a user upon installation of the application”. As previously explained, there is no enabling disclosure at all in Delo of how the installation process of Figure 6 that includes step 615 that mentions generation of a

dialog box, is generated. (“At step **615**,...the installer application **201** may display a user interface, such as a dialog box, which presents the user with the option of selecting which features of the product to install” Delo column 14 lines 45-53). Consequently, there is no suggestion in Delo of the feature combination of claim 8 including “creating a prompt question generating routine for inclusion in the installation instruction data by incorporating prompt questions into a predetermined question prompting executable procedure, the prompt questions being for answer by a user upon installation of the application”.

Dependent claim 9 is considered to be patentable based on its dependence on claims 1 and 8 and for the reasons given in connection with these claims. Claim 9 is also considered to be patentable because Delo does not show or suggest a method for “deriving installation related information supporting data exchange between different systems from configuration data associated with the application” including generating “prompt questions to be answered by a user upon installation...**derived from the configuration data**” of an application. These features are not shown or suggested in Delo.

Dependent claim 10 is considered to be patentable based on its dependence on claim 1 for the reason given in connection with claim 1. Claim 10 is also considered to be patentable because Delo does not show or suggest a method for “deriving installation related information supporting data exchange between different systems from configuration data associated with the application” including “creating prompt question documentation for inclusion in the installation instruction data, the prompt question being for answer by a user upon installation of an interface application supporting data exchange between different systems”. As previously explained, there is no enabling disclosure at all in Delo of how the installation process of Figure 6 that includes step 615 that mentions generation of a dialog box, is generated. (“At step **615**,...the installer application **201** may display a user interface, such as a dialog box, which presents the user with the option of selecting which features of the product to install” Delo column 14 lines 45-53). Consequently, there is no suggestion in Delo of the feature combination of claim 8 including “**creating prompt question documentation** for inclusion in the installation instruction data, the prompt question being for answer by a user upon installation of an interface application supporting data exchange between different systems”.

Dependent claim 11 is considered to be patentable based on its dependence on claim 1. Claim 11 is also considered to be patentable because Delo does not show (or suggest) a method including “providing a map for associating items of the derived installation related information and corresponding locations in the template installation information for use in incorporating the derived installation related information into the template installation information and supporting data exchange between different systems”. As previously explained, Delo is silent (and provides no 35 USC 112 enabling disclosure) on HOW installation instructions are generated. Delo merely states that “information *required to effect* the installation” is illustrated in the data tables shown in FIG. 4. (Delo column 12 line 66 to column 13 line 7). Simply indicating that particular information is “required to effect” installation does not provide enabling disclosure of HOW installation instructions are generated.

Further, Delo Figure 4 and associated text merely presents a block diagram “illustrating exemplary data table structures for maintaining data relating to computer software features, components, and resources”. It does NOT suggest “providing a map for associating items of the derived installation related information and **corresponding locations** in the **template** installation information for use in incorporating the derived installation related information into the template installation information and supporting data exchange between different systems”. Delo Figure 4 or elsewhere fails to show or suggest incorporation of “derived installation related information” into “template installation information” at all.

Dependent claim 13 is considered to be patentable based on its dependence on claim 1. Claim 13 is also considered to be patentable because Delo does not show (or suggest) locating “the system for automated generation of installation instruction documentation for an executable software application” on a “storage medium together with the application”. As previously explained Delo does not suggest “**automated** generation of installation instruction **documentation**” including data “**supporting data exchange** between different systems” or “storage” of such “installation instruction documentation” on a “medium **together with** the application”. Delo is silent (and provides no 35 USC 112 enabling disclosure) on HOW installation instructions are generated. Further, contrary to the Rejection statement on page 5, the Delo installation process is shown in Figure 6 and involves manual steps e.g. step 615 (“At step **615**,...the installer application **201** may display a user interface, such as a dialog box, which presents the user with the option of

selecting which features of the product to install” Delo column 14 lines 45-53). Step 670 relied on in the Rejection in column 16 lines 33-37 is just one step in a sequence of steps of Figure 6 involving manual user interaction.

Dependent claim 15 is considered to be patentable based on its dependence on claim 1. Claim 15 is also considered to be patentable because Delo does not show (or suggest) processing “template installation instruction information comprises predetermined text installation instructions **and** an executable procedure for **generating installation** instructions **upon** procedure execution”. As previously explained Delo does not suggest “automated” generation of installation instructions at all. Delo is silent (and provides no 35 USC 112 enabling disclosure) on HOW installation instructions are generated.

Independent claim 16 is considered to be patentable for the reasons given in connection with claims 1 and 8. Claim 16 is also considered to be patentable because Delo does not suggest a method for “automated generation of installation instructions for an executable software application” including “retrieving template installation instruction information from a data store, the installation instruction information including prompt questions for answer by a user upon installation of the application; deriving installation related information supporting data exchange between different systems from configuration data associated with the application; incorporating the derived installation related information into the template installation information to form installation instruction data; and presenting the installation instruction data to a user during an installation of the application”. As previously explained, Delo is silent (and provides no 35 USC 112 enabling disclosure) on HOW installation instructions are generated. Delo merely states that “information *required to effect* the installation” is illustrated in the data tables shown in FIG. 4. (Delo column 12 line 66 to column 13 line 7). Simply indicating that particular information is “required to effect” installation does not provide enabling disclosure of HOW installation instructions are generated. It also does not suggest “**automated** generation of installation instructions for an executable software application” by “retrieving **template** installation instruction information from a data store, the installation instruction information including **prompt questions** for answer by a user upon installation of the application” in combination with “deriving installation related information supporting **data exchange between different systems** from **configuration data associated with the application**”. Delo Figure 4 or elsewhere

fails to show or suggest incorporation of “derived installation related information” into “template installation information” at all.

Dependent claim 17 is considered to be patentable based on its dependence on claim 16 and for the reasons given in connection with claims 1, 8 and 16 and for reasons given later in connection with claim 14. Claim 17 is also considered to be patentable because Delo does not show or suggest a method for “**automated** generation of installation instructions for an executable software application...enabling communication and data exchange between said different systems” that “comprise executable applications to be enabled to communicate using installation data extracted from the configuration data, including at least one of, (a) a communication protocol identifier and (b) communication settings for at least one of said different systems”. These features are not shown or suggested in Delo.

Dependent claim 18 is considered to be patentable based on its dependence on claim 16 and for the reasons given in connection with claims 1, 8 and 16. Claim 18 is also considered to be patentable because Delo does not suggest the combination of features of claim 18 involving “**automated** generation of installation instructions for an executable software application” involving “creating a prompt question generating **procedure** for generating the prompt questions for answer by the user”. These features are not shown or suggested in Delo.

Dependent claim 19 is considered to be patentable based on its dependence on claim 16 and for the reasons given in connection with previous claims. Further, contrary to the Rejection statement on page 7, Delo in column 3 lines 22-37 does not show or suggest “selecting the prompt questions from a larger set of prompt questions”. There is no mention or suggestion anywhere in Delo of a “larger set of prompt questions”.

Independent claims 20 and 21 are considered to be patentable for the reasons given in connection with claims 1, 8 and 16 and because of the additional feature combinations they represent. Therefore, withdrawal of the rejection of claims 1-2, 4-5, 7-11, 13 and 15-21 under 35 USC 102(a) is respectfully requested.

III. Rejection under 35 U.S.C. 103(a)

Claim 6 is rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,237,144 – Delo in view of U.S. Patent 6,336,124 - Alam. These claims are considered patentable for reasons given in connection with claim 1 and for the following reasons.

Dependent claim 6 is considered to be patentable based on its dependence on claims 1 and 5. Claim 6 is also considered to be patentable because Delo in combination with Alam does not suggest a method for “deriving installation related information supporting data exchange between different systems from configuration data associated with the application” wherein the “derived installation instruction data comprise installation instruction text data for output as installation documentation and including the step of “selecting an output format for the installation documentation, the output format comprising Rich Text Format, Microsoft® Word compatible format, HTML document format, and Extensible Markup Language (XML) compatible format”. These features are not shown or suggested in Delo in combination with Alam.

Neither Delo nor Alam, individually or together, suggest such features. As previously explained Delo does not suggest “automated generation of installation instruction documentation” including data “supporting data exchange between different systems”. Further, Alam nowhere mentions installation information and Alam, with Delo, fails to suggest “**automated** generation of installation instruction documentation” including data “**supporting data exchange** between different systems”. Alam is concerned with “a method for converting a document stored in one format to a different format. More specifically, a system and method for converting digital data representing an image of a document image stored in one format to other formats for manipulation and display are disclosed” (Alam column 1 lines 16-21). Neither Delo nor Alam, individually or together, are concerned with the specific problems addressed by the claimed arrangement in providing “up-to-date documentation” for use in application and interface installation and there is no problem recognition, other motivation or reason for Delo with Alam to incorporate the claimed features. Incorporating the document conversion features of Alam in the system of Delo as suggested by the Rejection results in a system for conversion of instructions from one format to another, for example, and does not involve “**automated** generation of installation instruction documentation” including data “**supporting data exchange** between different systems”. Therefore, withdrawal of the rejection of claim 6 under 35 USC 103(a) is respectfully requested.

IV. Rejection under 35 U.S.C. 103(a)

Claims 3, 12, 14 and 22-23 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,237,144 – Delo in view of U.S. Patent 6,567,860 - Maxwell. These claims are considered patentable for reasons given in connection with claims 1 and 6 and for the following reasons.

Dependent claim 3 is considered to be patentable based on its dependence on claim 1. Claim 3 is also considered to be patentable because Delo with Maxwell does not show (or suggest) a method involving “deriving installation related information” for an “executable software application” comprising an “interface application enabling communication” between “different...executable applications”. There is no suggestion in Delo with Maxwell of “automated” generation of “installation instructions for an executable software application” at all and the combined references fail to contemplate “deriving installation related information” for an “executable software application” comprising an “interface application **enabling communication**” between “**different...executable applications**”. Incorporating the teaching of Maxwell in Delo as indicated in the Rejection on page 9 results in a system for installing a device driver application in a computer system based on information identifying pre-installed and uninstalled components of the driver. The combined system nowhere suggests “automated” generation of “installation instructions” for an “interface application **enabling communication**” between “**different...executable applications**” by “deriving installation related information” from application “configuration data”.

Dependent claim 12 is considered to be patentable based on its dependence on claim 1 and for the reasons given in connection with claims 1, 3, 8 and 16. Claim 12 is also considered to be patentable because Delo in combination with Maxwell does not suggest a method for “**automated** generation of installation instructions for an executable software application” in which the “executable software application is an interface application used in exchanging data between different systems comprising a first executable application and a different second executable application and further comprising prompting a user to select at least one of the first executable application and the second executable application”. These features are not shown or suggested in Delo in combination with Maxwell. Delo with Maxwell nowhere suggests such a feature combination involving “prompting a user

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to select at least one of the first executable application and the second executable application”.


Dependent claim 14 is considered to be patentable based on its dependence on claim 1 and for the reasons given in connection with claims 1, 3 and 16 and because of the additional feature combination that it incorporates.

Dependent claim 22 is considered to be patentable based on its dependence on claim 21 and for the reasons given in connection with claims 1, 3 and 16 and because of the additional feature combination that it incorporates.

Independent claim 23 recites a system for “automated generation of installation instructions for an executable software application” including, “configuration data for a software interface; a template, comprising documentation and data fields to receive one or more configuration data elements; a computer system comprising a memory and a processor; and software executable in the computer system for creating a data file containing installation data supporting data exchange between different systems derived from configuration data and incorporated into the template, the installation data comprising documentation of an installation process for the software interface”. Claim 23 is considered to be patentable for reasons given in connection with claim 1. Claim 23 is also considered to be patentable because Delo with Maxwell does not show (or suggest) processing “software executable in the computer system for creating a data file containing installation data supporting data exchange between different systems derived from configuration data”. As previously explained Delo with Maxwell does not suggest such features. Consequently, withdrawal of the rejection of claims 3, 12, 14 and 22-23 under 35 USC 103(a) is respectfully requested.

In view of the above amendments and remarks, Applicants submit that the Application is in condition for allowance, and favorable reconsideration is requested.

Respectfully submitted,


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